



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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Order Instituting Rulemaking Into
Implementation of Federal Communications
Commission Report and Order 04-87, As It
Affects The Universal Lifeline Telephone
Service Program.

R.04-12-001

**REPLY COMMENTS OF AT&T CALIFORNIA (U 1001 C)
ON ASSIGNED COMMISSIONER'S RULING SETTING SCOPE OF PHASE 2**

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January 18, 2008

Pursuant to the November 14, 2007 Assigned Commissioner's Ruling Setting Scope of Phase 2 ("Ruling") in the above-captioned proceeding and the instructions of Administrative Law Judge Jones,¹ Pacific Bell Telephone Company, doing business as AT&T California ("AT&T" or "AT&T California"), submits these Reply Comments.

I. INTRODUCTION

In Phase 2 of this proceeding, the Commission is considering modifications to California Lifeline that will ensure the widespread affordability and availability of high-quality telecommunications services among California's eligible low-income households in our current market. AT&T believes that the suggested solutions identified in the Ruling may be vital tools for enhancing the administration of the program and eliminating unnecessary burdens placed on participants, the carrier, and the Fund. Pre-qualification should be the first step in creating a streamlined, efficient process for certifying new Lifeline customers. Designing a web-based enrollment system, encouraging a single program-based criterion, refining certification forms, and synchronizing Lifeline's certification process with other low-income programs are also viable improvements to this program.

II. ISSUES

A. Customer Pre-Qualification

1. Lifeline Applicants Are Faced with Significant Backbilled Balances When Failing to Certify.

Based on the most recent raw data provided by Solix, approximately 59% of Lifeline applicants are deemed ineligible for program benefits and backbilled. This percentage is based on Solix' actual data for August 2007.² For that month, 109,000 customers enrolled in Lifeline. Of those customers, 7,000 removed from the program during the certification process and another 43,000 were denied benefits due to their failure to submit a completed certification form. Of those customers who returned a certification form, 14,020 of them were also denied Lifeline

¹ On December 19, 2007, ALJ Jones extended the deadline for filing reply comments to January 18, 2008.

² See Attachment 1, which is an e-mail from Christopher Didden at Solix illustrating the certification percentages for months for which Solix has complete data.

Benefits. Each of the 64,000 customers who were either removed from the program during the certification process or were denied Lifeline certification by Solix were re-graded off of the program and required to pay all backbilled charges. Even if these consumers subsequently re-enroll into the program successfully, General Order 153 (“GO”) does not afford them reimbursement of the backbilled charges.

The Joint Consumers’³ opposition to pre-qualification simply fails to acknowledge the significant volume of consumers faced with this backbilling dilemma, or the time and money consumers expend to get onto the program,⁴ much less the chaos that results to the program and the carriers. The following table illustrates the financial implications of backbilling:

Scenario - New AT&T Customer Signing Up for Lifeline Service

	Charge category	Customer Pays	Funds Pay	Total Charges
Month 1	Connection Charge	\$10.00	\$30.00	\$40.00
Customer Enrolls	Basic Rate (Flat)	\$5.34	\$5.35	\$10.69
	Federal EUCL	\$0.00	\$4.39	\$4.39
	Surcharges	\$0.00	\$0.00	\$0.00
	Total	\$15.34	\$39.74	\$55.08
Month 2	Basic Rate (Flat)	\$5.34	\$5.35	\$10.69
	Federal EUCL	\$0.00	\$4.39	\$4.39
	Surcharges	\$0.00	\$0.00	\$0.00
	Total	\$5.34	\$9.74	\$15.08
Month 3	Basic Rate (Flat)	\$10.69	\$0.00	\$10.69
Solix Notifies	Federal EUCL	\$4.39	\$0.00	\$4.39
AT&T of	Surcharges ⁵	\$0.23	\$0.00	\$0.23
Disqualification	Subtotal	\$15.31	\$0.00	\$15.31

(Table continued on next page)

³ The Utility Reform Network, the National Consumer Law Center, Disability Rights Advocates and Latino Issues Forum.

⁴ See Joint Consumers Opening Comments, p. 5 (stating that only 10% of customers who submit completed applications are denied benefits). Although the Comments state that “additional numbers of applicants who do not complete the application process fully [] may be subject to back billing,” they do not explain that including both groups brings the percentage up to over 50%.

⁵ The surcharge rate is 2.11%, which is the total of all public policy surcharges effective January 1, 2008.

Charge category	Customer Pays	Funds Pay	Total Charges
Backbilling			
Connection	\$30.00	(\$30.00)	\$0.00
Basic Rate (Flat)	\$10.70	(\$10.70)	\$0.00
Fed EUCL	\$8.78	(\$8.78)	\$0.00
Surcharges ⁶	\$0.86	\$0.00	\$0.86
Subtotal	\$50.34	(\$49.48)	\$0.86
Grand Total	\$65.65	(\$49.48)	\$16.17

Once deemed ineligible for Lifeline benefits, the AT&T customer's account is regraded off Lifeline and backbilled \$50.34 plus the current charges of \$15.31, for a total of \$65.65⁷ on his next bill. If the customer attempts to re-enroll in the program a second time, he would be subject to a discounted conversion fee of \$10.00. If he succeeds in certifying this second time, the Fund will cover \$4.25 of the conversion charge. If the customer does not certify, the customer is backbilled another \$4.25 plus any additional monthly recurring discounts received to date.

Based on the numbers provided by Solix, approximately 370,000 consumers, at a minimum, were re-graded off Lifeline and backbilled between June and November 2007.⁸ Assuming two months of backbilled benefits reflected in the table above, Lifeline applicants who could not certify in accordance with the GO were burdened with approximately \$19 million of backbilled charges. This estimate does not account for the varying rates of other carriers.

In addition to the cost imposed on customers, carriers, Solix, and Commission staff spend significant resources responding to customers' questions regarding backbilling charges, re-grading customer accounts, and adjusting back charges when denial decisions are overturned. A considerable strain is placed on carrier customer service representatives' time fielding

⁶ *Id.*

⁷ This total represents all backbilling charges, the current monthly service fee, the EUCL, and surcharges.

⁸ This figure is based on Solix' numbers on all customers who (a) were removed from the program during the certification process, (b) failed to return a certification form, and (c) denied certification after Solix reviewed their returned form. Solix was unable to provide a complete count for (c). As such, AT&T believes the total figure of approximately 370,000 is understated. See Attachment A.

customer inquires regarding back billed charges and back office support staff who manually process regrades that fall out of the normal mechanized process. This additional work by the carriers is eventually translated into costs that must be reimbursed by the Fund.

Furthermore, as SureWest and the Small LECs point out, the backbilling dilemma has had a severely damaging effect on customers' perception of the program.⁹ This has also created a damaging effect on carriers' customer satisfaction. Many customers do not distinguish between the Lifeline program and their carrier. Thus, it creates an overall negative customer experience that in some cases causes the customer to seek service with another provider. Customers have been significantly inconvenienced as a result of the backbilling and re-grading process. These consumers would be better served by a program that alleviates these dilemmas and prevents backbilling.

2. AT&T Opposes Joint Consumers' Proposal to Require Carriers to Offer Their Regular Customers a Payment Plan for Paying Backbilled Charges.

AT&T opposes any proposal that requires carriers to automatically place applicants who fail to certify for lifeline on a payment plan for backbilled charges.¹⁰ AT&T handles payment arrangements for all customers who have trouble paying their bills on a case-by-case basis, in accordance with its credit policies. The Commission does not place any limitations or requirements on carriers' credit policies, except in the Lifeline program in which case it reimburses carriers for bad debt. This Rulemaking should not be expanded to regulate carriers' credit policies for their non-Lifeline customer base. Rather, the Commission should focus on modifying the Lifeline program and the benefits available to its participants.

⁹ See SureWest/Small LECs Opening Comments, p. 2.

¹⁰ See, e.g., Joint Consumers Opening Comments, pp. 6-7.

3. Reimbursing Carriers for Backbilled Charges Beyond Three Months Does Not Resolve Customers' Backbilling Dilemma.

Parties have suggested the Fund reimburse carriers for all backbilled charges above a 3-month period as bad debt.¹¹ Though this proposal may alleviate the potential costs imposed on customers, it does not resolve the backbilling problem. Lifeline applicants would still be required to (1) pay backbilled non-recurring and recurring charges, (2) re-grade to regular residential service, and (3) re-enroll in Lifeline if they attempt certification again. Treating all backbilled amounts beyond three months as bad debt will also complicate the administration of the certification process and create additional implementation work for carriers' billing organizations. Ultimately, this approach will place a higher financial burden on the Fund and is an economically inefficient use of Fund monies. The Commission should address this problem at its source (the certification process), rather than with band-aids that create further problems at the end of the process.

4. Pre-Qualification Will Not Place Financial Burdens on the Lifeline Participant Establishing Service.

The pre-qualification process will eliminate all customer confusion and complaints that arise out of the backbilling process. The new customer will no longer face any backbilled charges each time he fails to certify for Lifeline benefits. Once the new Lifeline customer successfully enrolls in the program, the carrier will convert her account to Lifeline and credit all non-recurring charges in accordance with the GO and federal Lifeline/Link-Up. The carrier will also apply the appropriate discounts on monthly recurring charges as of the approval date.

¹¹ See *id.*, wherein Joint Consumers state that the Small LECs have proposed limiting a customer's backbill responsibility to three months and then allow the carrier to receive reimbursement for anything above that as bad debt.

(a) The non-recurring charges for regular service would not serve as a barrier for low-income customers installing regular service before enrollment into Lifeline.

AT&T agrees with Verizon¹² that most Lifeline subscribers can afford the non-recurring charges faced by a Lifeline applicant when installing regular service before enrollment in Lifeline. If she is unable to make full payment, she may use the carriers' installment billing option for non-recurring charges. It is AT&T's practice to offer all residential customers a 3-month installment billing option on installation charges.¹³ As such, a new AT&T customer has the ability to pay his non-recurring charges of \$40.00 over the course of three months.¹⁴ This would reduce the connection charge to approximately \$13.33 for three consecutive months. Therefore, each of the customer's first three bills for basic service would be approximately \$28.92¹⁵

(b) Carriers' credit policies will apply to all customers installing regular service.

Until Solix determines that the customer qualifies for Lifeline, the prospective Lifeline participant will be required to comply with the carrier's credit policy and pay an advance payment and/or deposit, if warranted. For AT&T, all new customers are not subject to a deposit or advance payment. A deposit is only required from those new customers who previously had service with AT&T and currently have an outstanding bill on file.¹⁶ An advanced payment is requested from customers who are a high or unknown credit risk.¹⁷ Low-income customers are not necessarily an unknown credit risk or high credit risk. In fact, based on our experience, only 5% of Lifeline customers fall into either of those categories.¹⁸

¹² Verizon Opening Comments, p. 5.

¹³ AT&T California's experience is that approximately 20% of Lifeline customers request installment billing.

¹⁴ In contrast, if AT&T customers cannot pay their billbacked balance when re-graded off Lifeline, AT&T will work with each customer on a case-by-case basis to establish a payment arrangement. This policy applies to all customers who are unable to pay their full balance.

¹⁵ This total represents non-recurring charges, the current monthly service fee, the EUCL, and surcharges.

¹⁶ A deposit is held for a 12-month period and then returned to the customer, with interest.

¹⁷ An advance payment is immediately applied to the customer's bill as a credit.

¹⁸ Approximately 2.3% of non-Lifeline residential customers fall under the high or unknown credit risk categories.

If the Commission believes that carriers' deposit and/or advance payment policies are a burden to the Lifeline applicants, AT&T proposes that the Fund cover these costs for Lifeline applicants actively seeking certification. Once the customer is approved for benefits, the carrier shall credit the Fund for all payments made in accordance with Rules 7.4 and 8.2. For those customers who do not qualify for benefits, the Fund shall absorb the cost as it handles bad debt under Rule 9.3.9. This policy would eliminate any barrier carriers' credit policies may create for installing new service.

(c) Lifeline could not accommodate DRA's proposed two-prong certification process.

AT&T opposes DRA's proposal to allow Lifeline applicants to enroll under the current process or through pre-qualification. This two-prong process would create confusion for both customers and carrier service representatives. In order to accommodate the two options, carriers would also require significant billing system development, modification of existing Methods and Procedures, and extensive customer service representative training. In addition, it would not resolve the backbilling burden faced by those customers who choose the current option. The Commission, Solix, and carriers would still be plagued with customer inquiries and complaints.

B. Lessons from Other States

1. Program-Based Criteria Are the Most Effective and Cost-Efficient Means for Certifying Eligibility.

Statistics from other states reveal that consumers prefer certifying under the program-based criteria because of convenience. It is AT&T's experience that in Florida and Tennessee only 4.5% of its Lifeline customers enroll using income-based eligibility, while the percentages in South Carolina and Indiana are even lower (1.6% and 3%, respectively). As such, regardless of whether the Commission eliminates the income-based criteria,¹⁹ it should append the list of

¹⁹ AT&T disagrees with Joint Consumer's proposition that PU Code 871.5 prohibits the elimination of income-based criteria. See Joint Consumers Opening Comments, p. 9. The Commission has discretionary authority to structure the program as it sees fit in order to accommodate the needs of the low-income consumer while, at the same time, satisfying its obligations to California by administering a Lifeline program as efficiently and economically as possible.

programs under which one can certify eligibility under the program-based criteria. This would allow Lifeline to cast a wider net and reach consumers that it currently does not reach. As examples, the Commission may consider adding U.S. Department of Agriculture programs such as the Child and Adult Care Food Program, the Special Milk Program, the School Breakfast Program and the Food Distribution Programs.

Furthermore, as proposed in AT&T's opening comments,²⁰ the Commission should initiate additional outreach efforts to encourage Community Based Organizations and the marketing and outreach vendor to educate consumers about the benefits and convenience of the program-based criteria. As more customers utilize the program-based criteria, Solix' certification process will become more automated. This will simplify Solix's procedures and ultimately result in lower administrative costs to the Fund.

C. Refinement in Customer Responses

1. Proprietary Carrier Information Should Not Be Shared with Informal Working Groups to Conduct Non-Response Mail Analysis.

AT&T supports the Joint Consumers' recommendation that the non-response data be analyzed by language²¹ in order to determine whether the program needs to adjust its outreach efforts, or re-design or modify the text on applications. However, AT&T opposes the Joint Consumers' proposal to distribute carrier-specific response data to the Implementation Working Group ("IWG").²² The IWG is a voluntary informal group of interested parties in which not all service providers participate. Further, it is not an official advisory body to the Commission as is the Universal Lifeline Telephone Service Advisory Committee. Proprietary, carrier-specific information should not be shared with this informal group.

Furthermore, it is not clear how return rates broken out by carrier will provide any additional insight into this non-response mail analysis. Joint Consumers argue that carrier-

²⁰ See AT&T California Opening Comments, p. 7.

²¹ See Joint Consumers Opening Comments, pp. 12-13.

²² See *id.* at 12.

specific information can reveal whether a particular carrier is facing challenges in having customers return certification, and even verification and audit forms. But since the Commission issued Decision No. 05-04-026, carriers are no longer involved in mailing and processing certification and verification forms. As such, they have no formal role in ensuring that their customers return forms. Accordingly, an analysis based on geographic-specific data would be more meaningful to the IWG's endeavor.

D. Synergies with Other Commission Low-Income Programs

1. Workshops Synchronizing the Commission's Low-Income Program Databases Must Include Participation from Other Industries.

DRA recommends that the Commission explore synchronizing its low-income programs in a workshop.²³ In order for such a workshop to be productive it must involve the participation of each Commission low-income program, related utilities, and interested consumer groups. As recommended in AT&T California's opening comments, this could only be done effectively by initiating a separate rulemaking.²⁴ A separate proceeding would ensure that all interested parties would have proper notice of the scope of the workshop and the issues to be addressed.

²³ See DRA Opening Comments, p. 7.

²⁴ See AT&T California Opening Comments, p. 9.

E. Miscellaneous

1. A Consistent Policy for Lifeline Customers Initiating New Service within the 104-Day Verification Window Is Needed.

SureWest and the Small LECs identify some concerns with the administration of Lifeline customers who install new service during their 104-day verification window.²⁵ Apparently, when in the 104-day verification window, the eligible Lifeline customer disconnects and installs new service within 30 days, she is required to certify as if new to the program. AT&T concurs that there is some confusion regarding the administration of these customers' eligibility status. The Commission should evaluate this process and clarify the appropriate steps Solix must follow.

III. CONCLUSION

For the foregoing reasons, AT&T California respectfully urges the Commission to adopt the recommendations set forth in its December 14, 2007 Initial Comments and these Reply Comments in Phase II of this proceeding.

Dated at San Francisco, California, this 18th day of January 2008.

Respectfully submitted,

/s/
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²⁵ See SureWest/Small LECs Opening Comments. pp. 3-5.

Attachment 1

-----Original Message-----

From: Didden, Christopher [<mailto:CDIDDEN@solixinc.com>]
Sent: Friday, January 11, 2008 11:58 AM
To: MONDON, JEFFREY A (ATTPB)
Cc: Schein, Benjamin
Subject: RE: CA Lifeline Certification Denials

Hi Jeff,

While I wish I had better numbers, such reports were not designed into the original system, as they were not included in the RFP. To that last comment, I have been able to reverse most of the data to enable me to show 'trends' in customer responses, and that is what I have been providing on the calls. So I hope this email helps answer some of your questions. I am also including Ben so he can add them in the next workgroup call minutes for everyone.

For the numbers in October that I provided, approximately 119,000 new certification customers were sent applications. Of those about 8,000 were removed or disconnected before their forms were received. From the remaining 111,000 customers about 65,000 returned an application for a response rate of 58%.

For other months, about
114,000 new certs were sent in June with 6,600 removed prior to the due date 52,000 returned
161,000 in July and 17,000 removed 70,000 returned
109,000 in Aug 7,000 removed 59,000 returned
104,000 in Sept 7,300 removed 54,000 returned
104,000 in November 6,600 removed, 55,000 returned
(I don't have December numbers yet)

With regards to the overall Approval rate of returned applications I only have complete numbers from August, and this shows an overall approval rate of about 91%. Again these are not 100% accurate, I am inferring some of this from the various indicators on the customers application decision tables. But when I ran the numbers by Karen Haith, she said it seemed close based on day to day reviews of the applications.

Certs
58,550 Returned
14,020 Denied
76% approval rate

Verts
180,000 Returned
8,100 Denied
95.5% approval rate

Audits
4,960 Returned

1,660 Denied
66.5% approval rate

Thanks,
Chip

-----Original Message-----

From: MONDON, JEFFREY A (ATTPB) [<mailto:jm7626@att.com>]
Sent: Thursday, January 10, 2008 5:17 PM
To: Didden, Christopher
Subject: CA Lifeline Certification Denials

Chip,

On our last Lifeline Working Group call, you indicated that for the month of October response rates for certification customers were at 58%.

Additionally, you indicated that for all three categories, on average 95% of those individuals that returned forms were approved. Could you share the actual number of customers that support this? Also, I'd like to know if you could share the number of total customers (not just AT&T)

that were denied certification (all reasons). I'm trying to see the magnitude of the number of customers that are subject to back billing. Do you have this information for October or better yet June through Dec 2007?

Thanks,

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I hereby certify that I have this day served a copy of the **REPLY COMMENTS OF AT&T CALIFORNIA (U 1001 C) ON ASSIGNED COMMISSIONER'S RULING SETTING SCOPE OF PHASE 2** on all known parties to **R.04-12-001**, by hand-delivery or by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official Service List, or by electronic mail and/or via messenger.

Executed this 18th day of January 2007, at San Francisco, California.

AT&T CALIFORNIA
525 Market Street
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/s/
Hugh Osborne

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